

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO. 4:24-CR-00507
	§	
GHOLAM REZA GOODARZI	§	

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

TO THE HONORABLE CHARLES ESKRIDGE, UNITED STATES DISTRICT JUDGE  
FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

NOW COMES, GHOLAM REZA GOODARZI, defendant, by and through  
counsel, and files this Unopposed Motion to Modify Conditions of Release and in support  
thereof would show as follows:

I.

The defendant is requesting permission from this Honorable Court to amend the  
conditions of release to remove the Home Incarceration restriction and impose Home  
Detention, leaving all other conditions in place.

II.

Defendant was arrested on September 3, 2024, pursuant to a federal complaint [Doc.  
1] filed in the United States District Court for the Southern District of Texas, Houston  
Division on August 30, 2024, for an offense alleged to have occurred from on or about  
December 2020 to July 2024. On September 29, 2024, this Honorable Court granted an  
Order Setting Conditions of Release [Doc. 20]. Condition 8 (s, iii) orders Home  
Incarceration, which restricts the defendant to his residence at all times except for medical

needs or treatment, and court appearances pre-approved by the Pretrial Services Office or Supervising Officer.

During the months on bond, the defendant had no issues, no violations, nothing that would cause that Court or this Honorable Court any concern. In total, defendant has been on bond for 3 months. The defendant is requesting permission from this Honorable Court to amend the conditions of release to impose a Home Detention, and remove the Home Incarceration condition.

WHEREFORE, PREMISES CONSIDERED, the defendant prays that this Honorable Court grant this motion and amend the conditions of release, removing the Home Incarceration condition and replacing it with Home Detention.

Respectfully submitted,

/s/ Kent A. Schaffer

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Counsel for Defendant,

GHOLAM REZA GOODARZI

**CERTIFICATE OF CONFERENCE**

On January 8, 2025, counsel for defendant conferred with AUSA Heather Winter regarding her position on defendant's motion. AUSA Winter stated that the government is unopposed.

On January 8, 2025, counsel had conferred with U.S. Probation Officer McClanen. Mr. McClanen stated that he is unopposed to Home Detention.

/s/ Kent A. Schaffer

KENT A. SCHAFFER

**CERTIFICATE OF SERVICE**

I hereby certify that on January 8, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties registered for CM/ECF.

/s/ Kent A. Schaffer

KENT A. SCHAFFER